



Stephen B. Kemp  
Vice President  
Health, Environment & Safety

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**ORIGINAL**

September 14, 2001

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Honorable Christie Whitman, Administrator  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116  
Attn: Chemical Right-to-Know Program

**RE: Occidental Chemical Corporation (OxyChem) HPV Commitments for 2000**

Dear Administrator Whitman:

As part of our overall commitment to the American Chemistry Council Responsible Care® and product stewardship programs, Occidental Chemical Corporation (OxyChem) has agreed to participate in the HPV Challenge. Our Chief Executive Officer, J. Roger Hirl, sent USEPA a letter to this effect on March 9, 1999.

Our commitment for 2000 included three chemicals which OxyChem was the sole U.S. manufacturer:

Chemical Name	CAS Number
Benzene, chloromethyl-	[25168-05-2]
Toluene, p-chloro-	[106-43-4]
Benzene, 1-chloro-2-methyl-	[95-49-8]

In the first quarter of 2001, manufacturing operations for these chemicals were shut down. This information is communicated to you in a separate letter dated today, September 14, 2001. As a result, we no longer manufacture, import or sell a number of chemicals. We had retained a contractor to accumulate data, prepare robust summaries, enter data in the IUCLID format, etc. With the shut down of manufacturing, our contractor ceased further work on these chemicals. The data in the form in which it existed at the time, is enclosed in electronic format on the enclosed disk. A hard copy is available if you prefer.

**Occidental Chemical Corporation**

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We look forward to working with EPA in a continued effort to address any potential data needs and to make the information more publicly available.

Sincerely,

Stephen B. Kemp  
Vice-President, Health, Environment and Safety

Attachment

Cc: Mr. J. Alan Mack, Occidental Chemical, Inc.  
Mr. Mark Stenzel, Occidental Chemical, Inc.  
Mr. Thomas Feeney, Occidental Chemical, Inc.  
Mr. Steven K. Russell, American Chemistry Council